

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Dana Corporation, Spicer Axle Division
2100 West State Boulevard
Fort Wayne, Indiana 46801**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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| Operation Permit No.: T 003-7741-00003 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: |

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an axle manufacturing plant.

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|-----------------------|---|
| Responsible Official: | William Hoffman |
| Source Address: | 2100 West State Boulevard, Fort Wayne, Indiana 46801 |
| Mailing Address: | P.O. Box 750 Fort Wayne, Indiana 46801 |
| SIC Code: | 3714 |
| County Location: | Allen |
| County Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- 1) One (1) boiler, identified as boiler 3, segment ID 001, fueled by natural gas, using distillate fuel and liquid petroleum gas as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- (2) One (1) boiler, identified as boiler 4, segment ID 002, fueled by natural gas, using distillate fuel and liquid petroleum gas as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.
- (3) One (1) boiler, identified as boiler 8, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B.
- (4) One (1) boiler, identified as boiler 9, segment ID 002, fueled by natural gas, using distillate fuel liquid petroleum gas as back-up fuels, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B.
- (5) Three (3) surface coating booths, identified as Spray 1, Spray 2, and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stack S2.
- (6) Two (2) tanks, identified as 18 and 19, product stored mineral spirits, each having a height of 18 feet with a diameter of 8 feet, maximum capacity of 6,800 gallons.
- (7) Cleaning process, using mineral spirits, to clean spray guns, and on an as needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year.

- (8) Washing process, solvent used mixture of water and on-line cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.
- (9) One (1) portable generator, fueled by number 2 oil, maximum heat input is 2.8 MMBtu per hour.
- (10) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as boilers 6 and 7.

Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas, using #2 fuel oil as back-up fuel, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

SECTION C

SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]

- (a) The total source potential to emit of criteria pollutant are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the compliance monitoring requirements and the date(s) of each such deviation must be reported."
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in the Emergency/Deviation Occurrence Reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- 1) One (1) boiler, identified as boiler 3, segment ID 001, fueled by natural gas, using distillate fuel and liquid petroleum gas as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- (2) One (1) boiler, identified as boiler 4, segment ID 002, fueled by natural gas, using distillate fuel and liquid petroleum gas as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 the particulate matter (PM) from the boilers identified as 3 and 4 shall be limited to:

- (a) 0.6 pounds per MMBtu when using natural gas.
- (b) 0.6 pound per MMBtu heat input when using distillate fuel.
- (c) 0.6 pound per MMBtu heat input when using liquid petroleum gas.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the 50 MMBtu per hour oil-fueled boiler shall not exceed 0.5 pounds per MMBtu heat input. Based on a heating value of 140,000 Btu per gallon of oil, the fuel sulfur content of the oil used for fuel shall be limited to 0.5 percent (%) when using distillate fuel.

Compliance Determination Requirement

D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

- (a) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter and sulfur dioxide limits specified in Condition D.1.1 (a) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.
- (b) Compliance shall be determined utilizing one of the following options when using distillate fuel.
 - (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 50 MMBtu per hour heater, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.1.4 Monitoring

Annual oil sampling shall be conducted as described in 326 IAC 3-7-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-7-4 (a) when using distillate oil.

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the boilers (identified as 3 and 4) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit,

from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

- (a) The natural gas boiler certification form will document compliance with condition D.1.1 when the boiler is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.
- (b) A summary of the information to document compliance with Condition D.1.1(b) and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit upon request when using distillate fuel.

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)] insignificant:

- (3) Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas, using #2 fuel oil as back-up fuel, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 6.7 MMBtu per hour heat input boilers shall be limited to 0.8 pounds per MMBtu for natural gas and # 2 fuel oil.

This limitation is based on the following equation: $Pt = Pt = (C) (a) (h) / (76.5) (Q^{0.75}) (N^{0.25})$

C = Maximum ground level concentration being 50 micrograms/cubic meter

Pt = Pounds of particulate matter emitted per MMBtu heat input (lb/MMBtu)

Q = Total source maximum operating capacity rating in MMBtu/hr heat input

N = Number of stacks in fuel burning operation

a = Plume rise factor being 0.67

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

There are no compliance reporting requirements.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (4) One (1) boiler, identified as boiler 8, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B.
- (5) One (1) boiler, identified as boiler 9, segment ID 002, fueled by natural gas, using distillate fuel liquid petroleum gas as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-3][40CFR 60.40c]

Pursuant to 326 IAC 6-2-3 the particulate matter (PM) from the boilers identified as 8 and 9 shall be limited to:

- (a) 0.1 pounds per MMBtu when using natural gas.
- (b) 0.1 pound per million BTU heat input. Based on a heating value of 140,000 Btu per gallon of oil, the fuel sulfur content of the oil used for fuel shall be limited to 0.5 percent (%) when using distillate fuel.
- (c) 0.1 pounds per MMBtu when using LPG propane fuel.

D.3.2 Opacity limit [40 CFR 60.43c]

The particulate matter emissions shall be limited such that the opacity from the gases exhausted does not exceed 20 % over any 6 minute average, except for one 6 minute period per hour in which opacity shall not exceed 27%.

D.3.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]

- (a) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):
 - (i) The SO₂ emissions from the 40.2 MMBtu per hour oil-fueled boiler shall not exceed 0.5 pounds per MMBtu heat input; or
 - (ii) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (b) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

Compliance Determination Requirement

D.3.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter and sulfur dioxide limit specified in Condition D shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options when using distillate fuel:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.3.6 Monitoring

- (a) There are no compliance monitoring for this boiler when burning natural gas or LGP propane.
- (b) Annual oil sampling shall be conducted as described in 326 IAC 3-3-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-3-4 (a) when using distillate fuel.

The PM and SO₂ emissions shall be monitored pursuant to the requirements of 40 CFR 60.46c and 60.47c, respectively.

D.3.7 Visible Emissions Notations

- (a) Daily visible emission notations of the boilers (identified as 8 and 9) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1(b) and D.3.2 the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;

- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

- (a) The natural gas boiler certification form will document compliance with condition D.3.1(a) when the boiler is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C - General Reporting Requirements of this permit.
- (b) A summary of the information to document compliance with Condition D.3.1(b), and D.3.2 and shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit upon request.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (6) Three (3) surface coating booths, identified as Spray 1, Spray 2 and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stacks 137, 140, and 141 respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating booth 1, 2, and 3 shall be limited to 3.5 pounds of VOCs per gallon of coating less water. The coatings used are considered extreme performance coatings which are coatings designed for exposure to temperatures consistently above ninety-five degrees Celsius (95° Celsius), detergents, abrasive or scouring agents, solvents, corrosive atmospheres, outdoor weather at all times, or similar environmental condition.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) over spray from this paint booth identified as E-35-1P be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter and volatile organic compound limit specified in Condition D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stack S2 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.7 Particulate Matter (PM)

The dry filter for PM control shall be in operation at all times when the surface coating are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) If a coating having a VOC content greater than the amounts specified in condition D.4.1 is used, compliance shall be based on the volume weighted average VOC content of the coatings used for each day. The volume weighted average VOC content of the coatings shall be determined using the following equation:

$$\frac{\text{lb VOC}}{\text{gallons less water}} = \frac{\sum \text{coatings [D*O*Q / [1-W*Dc/Dw]]}}{\sum C}$$

////

Dc = density of coating, lb/gal
Dw = Density of water, lb/gal
O = weight percent organics, %
Q = Quantity of coating, gal/unit
W = percent volume water, %
C = total of coatings used, gal/unit

- (b) To document compliance with Condition D.4.1, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5

FACILITY CONDITIONS

- (10) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.

Emissions Limitation and Standards

D.5.1 Prevention of Significant Deterioration (PSD)[326 IAC 2-2]

- (a) The fuel oil no. 2 usages from the proposed Peak Shaving Generator, and the existing boilers 3, 4, 8, and 9 shall be limited as follows:

| Facility ID | Fuel Oil # 2 Usage Limit (kgal/yr) |
|---|------------------------------------|
| Boilers 3 & 4 (@ 50 mmBtu/hr) | 6,257 |
| Boilers 8 & 9 (@ 40.2 mmBtu/hr) | 5,030 |
| Proposed Peak Shaving Generator (6.7 mmBtu/hr) | 229.5 |
| TOTAL | 11,516.5 |

The fuel oil no. 2 usage limit shall be based on a twelve- month rolling period.

During the first twelve months of operation of the peak shaving generator, shall be limited such that the total usage (229.5 kgal/yr) divided by the accumulated months of operation (12 months) shall not exceed 19.125 kgal rolled on a monthly basis.

- (b) For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
- (c) For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

Compliance with this condition D.5.1 (a) through (c) will make the source wide emissions below 250 tons per twelve-month, thus keeping the source a minor source for the Prevention of Significant Deterioration (PSD).

D.5.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity from the Peak Shaving Generator stack exhaust #149 shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

D.5.3 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Peak Shaving Generator.

Compliance Determination Requirements

D.5.4 Testing Requirements

Pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) a one time compliance stack tests shall be performed for the Peak Shaving Generator within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Compliance stack tests shall be performed, to validate the Alternative Emission Factors (AEF) for NOx used in the calculation. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Peak Shaving Generator stack exhaust #149 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Record Keeping and Reporting Requirements

D.5.6 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, D.5.2 the Permittee shall maintain records in accordance below.

- (1) Fuel oil usage and equivalent Nitrogen oxide (NOx) emissions;

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.5.2 the Permittee shall maintain records of daily visible emission notations of the Peak Shaving Generator stack exhaust #149.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

This form consists of 2 pages

Page 1 of 2

| | |
|----------------------------|--|
| Check either No. 1 or No.2 | |
| 9 | 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 | 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days |

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency/Deviation: |
| Describe the cause of the Emergency/Deviation: |

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency/Deviation started: |
| Date/Time Emergency/Deviation was corrected: |
| Was the facility being properly operated at the time of the emergency/deviation? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency/deviation: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

| | | |
|--|--|--|
| | | |
| | | |
| | | |
| | | |

I certify under penalty of law that at all times, except as otherwise noted above, only natural gas was burned in the indicated boilers during the report period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003
Facility: surface coating booths
Parameter: VOC content of coatings
Limit: 3.5 pounds of VOCs per gallon of coating less water

Month: _____ Year: _____

| Day | Daily Weighted Average of enamel VOC content | | | Day | Daily Weighted Average of enamel VOC content | | |
|-----|--|--|--|-------------------|--|--|--|
| 1 | | | | 17 | | | |
| 2 | | | | 18 | | | |
| 3 | | | | 19 | | | |
| 4 | | | | 20 | | | |
| 5 | | | | 21 | | | |
| 6 | | | | 22 | | | |
| 7 | | | | 23 | | | |
| 8 | | | | 24 | | | |
| 9 | | | | 25 | | | |
| 10 | | | | 26 | | | |
| 11 | | | | 27 | | | |
| 12 | | | | 28 | | | |
| 13 | | | | 29 | | | |
| 14 | | | | 30 | | | |
| 15 | | | | 31 | | | |
| 16 | | | | no. of deviations | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

| Compliance Monitoring Requirement (e.g. Permit Condition D.1.3) | Number of Deviations | Date of each Deviations |
|---|-----------------------------|--------------------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

| Month | Column 1 | | | Column 2 | | | Column 1 + 2 | | |
|---------|--|---|---|--|---|---|--|---|---|
| | Peak shaving Fuel Oil No. 2 Usage This month | Boilers 3 & 4 Fuel Oil No. 2 Usage This Month | Boilers 8 & 9 Fuel Oil No. 2 Usage This Month | Peak shaving Fuel Oil No. 2 Usage for Past 11 Months | Boilers 3 & 4 Fuel Oil No. 2 Usage for Past 11 Months | Boilers 8 & 9 Fuel Oil No. 2 Usage for Past 11 Months | Peak shaving Fuel Oil No. 2 Usage 12 Month Total | Boilers 3 & 4 Fuel Oil No. 2 Usage 12 Month Total | Boilers 8 & 9 Fuel Oil No. 2 Usage 12 Month Total |
| Month 1 | | | | | | | | | |
| Month 2 | | | | | | | | | |
| Month 3 | | | | | | | | | |

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

| Month | Fuel Oil No. 2 Usage (Kgal/mo) | Natural Gas Usage (MMCF/mo) | LPG Usage (Kgal/mo) | Fuel Oil No. 2 Equivalent (MMCF/mo) | Total Fuel Oil No. 2 Usage (Kgal/mo) |
|-----------|-----------------------------------|--------------------------------|------------------------|--|---|
| January | | | | | |
| February | | | | | |
| March | | | | | |
| April | | | | | |
| May | | | | | |
| June | | | | | |
| July | | | | | |
| August | | | | | |
| September | | | | | |
| October | | | | | |
| November | | | | | |
| December | | | | | |

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit and
Enhanced New Source Review**

Source Background and Description

| | |
|------------------------------|---|
| Source Name: | Dana Corporation, Spicer Axle Division |
| Source Location: | 2100 West State Blvd., Fort Wayne, IN 46801 |
| County: | Allen |
| SIC Code: | 3714 |
| Operation Permit No.: | T003-7741-00003 |
| Permit Reviewer: | Peggy Zukas |

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Dana Corporation, Spicer Axle Division relating to the operation of an axle manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) boiler, identified as boiler 3, segment ID 001, fueled by natural gas, using distillate fuel and waste oil as back-up fuels, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- (2) One (1) boiler, identified as boiler 4, segment ID 002, fueled by natural gas, using distillate fuel and waste oil as back-up fuels, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.
- (3) Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas, each boiler 6.7 MMBtu per hour, each exhausting to one (1) stack.

Note: There are no boilers identified as 1 and 2. Boiler 5, rated at 520 MMBtu/hr, has been shut down.

- (4) One (1) boiler, identified as boiler 8, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas, and waste oil as back-up fuels, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B.
- (5) One (1) boiler, identified as boiler 9, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas and waste oil as back-up fuels, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B.
- (6) Three (3) surface coating booths, identified as Spray 1, Spray 2 and Spray 3, having a maximum throughput of 37 units per hour, coating metal axles, application method is airless, using dry filters as control, and exhausting to stacks S2.
- (7) Two (2) tanks, identified as 18 and 19, product stored mineral spirits, each having a height of 18 feet with a diameter of 8 feet, maximum capacity of 6,800 gallons.

Unpermitted Emission Units and Pollution Control Equipment Under Enhanced New Source Review

The source also consists of the following unpermitted facilities/units:

- (8) Cleaning process, solvent used mineral spirits, used to clean paint booths, spray guns, flow coaters and as a needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year.
- (9) Washing process, solvent used mixture of water and on-line cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour identified as boilers 6 and 7.
- (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (3) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (4) Application oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (5) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (7) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (8) Quenching operations used with heat treating processes.
- (9) Replacement or repair of electrostatic precipitation, bags in baghouses and filters in other air filtration equipment.
- (10) Paved and unpaved roads and parking lots with public access.
- (11) Purging of gas lines and vessels that is related to routine maintenance and repair of building, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (12) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

- (13) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (14) A laboratory as defined in 326 IAC 2-7 (20) (C).
- (15) Any unit emitting greater than (1) pound per day but less than 5 pounds per day or 1 tons per year of a single HAP. The following is a brief description:
 - a) Smog hog filter washing
 - b) 34 welding stations
- (16) Udylyte process with wet scrubber.
- (17) Flow coaters #1, #2, #3 exhausting indoors using a water based coating: United XN-174.

Existing Approvals

The source has been operating under the following approvals:

- (1) E003-5025-00003, issued on December 28, 1995,
- (2) CP 003-4377-0003, issued on May 22, 1995,
- (3) E 003-4212-0003, issued on December 22, 1994,
- (4) Amendment to registration, issued on June 2, 1989,
- (5) Amendment to 02-03-86-0600, issued on June 23, 1993,
- (6) Amendment to the registration dated June 2, 1989, issued on January 12, 1993,
- (7) Amendment to 02-03-86-0600, issued on December 26, 1990,
- (8) Registered, no permit number was given, issued on June 2, 1989
- (9) CP 02-03-86-0601, issued on June 7, 1982,
- (10) OP 02-03-86-0600, issued on June 7, 1982,
- (11) OP 02-03-86-0599, issued on June 7, 1982,
- (12) Registration, no permit number was given, issued on October 28, 1981,
- (13) OP 02-03-81-0355, issued on March 3, 1977,
- (14) OP 02-03-81-0358, issued on March 3, 1977,
- (15) OP 02-03-81-0359, issued on March 3, 1977, and
- (16) OP 02-03-81-0360, issued on March 3, 1977.

None of the permits mentioned above were PSD permits.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
 - (1) Cleaning process, solvent used mineral spirits, used to clean paint booths, spray guns, flow coaters and as a needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year.
 - (2) Washing process, solvent used mixture of water and on-line cleaner, used to clean oil and grease build-up, stored in a closed container, maximum usage is 6,000 gallons per year.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on January 17, 1997.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (18 pages).

| Boiler ID | MMBtu/hr | Construct- ion date | Limit PM lb/MMBtu | Comply with rule 326 IAC 6-2 | Limit SO2 lb/MMBtu | Comply with rule 326 IAC 7-1 | Fuel used |
|-----------|----------|------------------------|----------------------|---------------------------------------|--------------------------|------------------------------------|--|
| Boiler 3 | 50.0 | 1973 | 0.6 for all fuels | yes | 0.5 distillate oil | yes | Natural gas, waste oil, distillate oil, |
| Boiler 4 | 50.0 | 1973 | 0.6 for all fuels | yes | 0.5 distillate oil | yes | Natural gas, waste oil, distillate oil, |
| Boiler 6 | 6.7 | 1953 | 0.8 | yes | N/A | N/A | Natural gas |
| Boiler 7 | 6.7 | 1953 | 0.8 | yes | N/A | N/A | Natural gas |
| Boiler 8 | 40.2 | 1995 | 0.1 for all fuels | yes | 0.5 distillate oil | yes | Natural gas, waste oil, distillate oil, propane gas |
| Boiler 9 | 40.2 | 1995 | 0.1 for all fuels | yes | 0.5 distillate oil | yes | Natural gas, waste oil, distillate oil, propane gas |

(a) Natural gas PM limit

1. Boilers 3 and 4 rule applicability: (50.0 MMBtu/hr each)

| | | | |
|--------------|---|--------------|-----------------------------|
| Allowable PM | | Potential PM | |
| 30.0 lbs/hr | > | 0.3 lbs/hr | complies with 326 IAC 6-2-3 |

| | | | |
|----------------|---|------------------------|-----------------------------|
| Allowable PM10 | | Potential control PM10 | |
| 30.0 lbs/hr | > | 0.3 lbs/hr | complies with 326 IAC 6-2-3 |

2. Boiler 6 and 7 rule applicability: (6.7 MMBtu/hr each)

| | | | |
|--------------|---|--------------|-----------------------------|
| Allowable PM | | Potential PM | |
| 5.4 lbs/hr | > | 0.05 lbs/hr | complies with 326 IAC 6-2-3 |

| | | | |
|----------------|---|----------------|-----------------------------|
| Allowable PM10 | > | Potential PM10 | |
| 5.4 lbs/hr | > | 0.05 lbs/hr | complies with 326 IAC 6-2-3 |

3. Boiler 8 and 9 rule applicability: (40.2 MMBtu/hr each)

| | | | |
|--------------|---|--------------|-----------------------------|
| Allowable PM | > | Potential PM | complies with 326 IAC 6-2-4 |
| 4.0 lbs/hr | | 0.3 lbs/hr | |

| | | | |
|----------------|---|----------------|-----------------------------|
| Allowable PM10 | > | Potential PM10 | |
| 4.0 lbs/hr | | 0.3 lbs/hr | complies with 326 IAC 6-2-4 |

(b) LPG - Propane PM limit

4. Boiler 8 and 9 rule applicability: (40.2 MMBtu/hr each)

| | | | |
|--------------|---|--------------|-----------------------------|
| Allowable PM | > | Potential PM | complies with 326 IAC 6-2-4 |
| 4.0 lbs/hr | | 0.3 lbs/hr | |

| | | | |
|----------------|---|----------------|-----------------------------|
| Allowable PM10 | > | Potential PM10 | |
| 4.0 lbs/hr | | 0.3 lbs/hr | complies with 326 IAC 6-2-4 |

(c) Waste Oil PM limit

5. Boilers 3 and 4 rule applicability: (50.0 MMBtu/hr each)

| | | | |
|--------------|---|--------------|-----------------------------|
| Allowable PM | | Potential PM | |
| 30 lbs/hr | > | 0.4 lbs/hr | complies with 326 IAC 6-2-3 |

| | | | |
|----------------|---|--------------------|-----------------------------|
| Allowable PM10 | | After control PM10 | |
| 30 lbs/hr | > | 0.4 lbs/hr | complies with 326 IAC 6-2-3 |

6. Boiler 8 and 9 rule applicability: (40.2 MMBtu/hr each)

| | | | |
|--------------|---|--------------|-----------------------------|
| Allowable PM | > | Potential PM | complies with 326 IAC 6-2-4 |
| 4.0 lbs/hr | | 0.3 lbs/hr | |

| | | | |
|----------------|---|----------------|-----------------------------|
| Allowable PM10 | > | Potential PM10 | |
| 4.0 lbs/hr | | 0.3 lbs/hr | complies with 326 IAC 6-2-4 |

(d) Fuel Oil PM limit

7. Boilers 3 and 4 rule applicability: (50.0 MMBtu/hr each)

| | | | |
|--------------|---|--------------|-----------------------------|
| Allowable PM | | Potential PM | |
| 30.0 lbs/hr | > | 0.7 lbs/hr | complies with 326 IAC 6-2-3 |

| | | | |
|----------------|---|--------------------|-----------------------------|
| Allowable PM10 | | After control PM10 | |
| 30.0 lbs/hr | > | 0.7 lbs/hr | complies with 326 IAC 6-2-3 |

8. Boiler 8 and 9 rule applicability: (40.2 MMBtu/hr each)

| | | | |
|--------------|---|--------------|-----------------------------|
| Allowable PM | > | Potential PM | complies with 326 IAC 6-2-4 |
| 4.0 lbs/hr | | 2.5 lbs/hr | |

| | | | |
|----------------|---|----------------|-----------------------------|
| Allowable PM10 | > | Potential PM10 | |
| 4.0 lbs/hr | | 2.5 lbs/hr | complies with 326 IAC 6-2-4 |

(e) Fuel Oil SO2 limit

9. Boilers 3 and 4 rule applicability: (50.0 MMBtu/hr each)

| | | | |
|---------------|---|---------------|-------------------------------|
| Allowable SO2 | > | Potential SO2 | |
| 25.0 lbs/hr | | 15.2 lbs/hr | complies with 326 IAC 7-1.1-2 |

10. Boiler 8 and 9 rule applicability: (40.2 MMBtu/hr each)

| | | | |
|---------------|---|---------------|-------------------------------|
| Allowable SO2 | > | Potential SO2 | complies with 326 IAC 7-1.1-2 |
| 20.1 lbs/hr | | 12.2 lbs/hr | |

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

| Pollutant | Potential Emissions (tons/year) |
|-----------------|---------------------------------|
| PM | greater than 250 |
| PM-10 | greater than 250 |
| SO ₂ | greater than 250 |
| VOC | greater than 250 |
| CO | greater than 250 |
| NO _x | greater than 250 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Potential Emissions (tons/year) |
|---------------|---------------------------------|
| Glycol Ethers | greater than 10 |
| TOTAL | greater than 10 less than 25 |

- (a) The potential emissions (as defined in the Indiana Rule) of particulate matter, oxides of nitrogen, sulfur dioxide, carbon monoxide, and volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year or the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year.

Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1995 emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 21.6 |
| PM-10 | 6.3 |
| SO ₂ | 49.2 |
| VOC | 29.2 |
| CO | 16.3 |
| Glycol Ethers | 6.76 |
| NO _x | 56.0 |

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

| | Limited Potential to Emit (tons/year) | | | | | | |
|---|--|-------------------------------------|------------------|--|--------|-----------------|----------|
| Process/ facility | PM | PM-10 | SO ₂ | VOC | C O | NO _x | HA Ps |
| Boilers 3 and 4 (50 MMBtu/hr each) | 0.6 lb/MMBtu | 0.6 lb/MMBtu | 0.5 lbs/MMBtu | — | - - | -- | -- |
| Boilers 6 and 7 (6.7 MMBtu/hr each) | 0.8 lb/MMBtu | 0.8 lb/MMBtu | — | — | - - | -- | -- |
| Boilers 8 and 9 (40.2 MMBtu/hr each) | 0.1 lb/MMBtu | 0.1 lb/MMBtu | 0.5 lbs/MMBtu | — | - - | -- | -- |
| Surface coating booths 1,2 and 3 | as determined by rule 6-3 | as determine d by rule 6-3 | -- | 3.5 pounds of VOC per gallon of coating less water | - - | -- | -- |

County Attainment Status

The source is located in Allen County.

| Pollutant | Status |
|-----------------|------------|
| TSP | attainment |
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) Boilers 3,4, 6, and 7 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the boilers were constructed before the June 9, 1989 applicability date.

| Boilers ID | Installation date | Date of rule applicability | Exempt from 326 IAC 12, (40 CFR 60.40c, Subpart Dc) |
|--|-------------------|----------------------------|---|
| Boilers 3 and 4 (50 MMBtu/hr each) | 1973 | 1989 | yes |
| Boilers 6 and 7 (6.7 MMBtu/hr each) | 1953 | 1989 | yes (the boilers are less than 10 MMBtu/hr) |

- (b) Boilers 8 and 9 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.42c, Subpart Dc).

- (1) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (A) The SO₂ emissions from the 40.2 MMBtu per hour oil-fueled boiler shall not exceed 0.5 pounds per MMBtu heat input; or
 - (B) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]
- (2) Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.
- (c) Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options when using distillate fuel or waste oil:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (d) Annual oil sampling shall be conducted as described in 326 IAC 3-3-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-3-4 (a) when using distillate fuel and waste oil.
- (e) Particulate matter emissions limitations [40 CFR 60.43 c] for boilers 8 and 9:
Pursuant to 40 CFR 60.43c, the gases that are discharged into the atmosphere shall be limited to 20 % opacity.

The PM and SO₂ emissions shall be monitored pursuant to the requirements of 40 CFR 60.46c and 60.47c, respectively.
- (f) Pursuant to New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) the tanks identified as 18 and 19 are exempt from this rule since the tanks capacity is 25 cubic meters which less than the applicable capacity of 40 cubic meters.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 and CFR 52.21(Prevention of Significant Deterioration), this source is a major source because the potential emissions are greater than 250 tons per year.

Dana Corporation, Spicer Axle Division is not subject to PSD review because boilers 3, 4, 6 and 7 predate the rule and boilers 8 and 9 netted out of PSD review by the shut down and removal of boiler 5.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year (for specific counties) or one hundred (100) tons per year of nitrogen oxides, sulfur dioxides, carbon monoxide, particulate matter 10, particulate matter and volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Particulate Matter Limitation 326 IAC 6-2-3

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from two boilers identified as 6 and 7 each having a heat capacity of 6.7 MMBTU per hour shall be limited to 0.8 pound per million BTU heat input. The boilers comply with this rule.

The PM was calculated by: $Pt = (C) (a) (h) / (76.5) (Q)^{0.75} (N)^{0.25}$ (Refer to Appendix A for further details)

Particulate Matter Limitation 326 IAC 6-2-3

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from two boilers identified as 3 and 4 each having a heat capacity of 50.0 MMBTU per hour shall be limited to 0.6 pound per million BTU heat input. The boilers comply with this rule.

The PM was calculated by: $Pt = (C) (a) (h) / (76.5) (Q)^{0.75} (N)^{0.25}$ (Refer to Appendix A for further details)

Where: C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise.

h = Stack height in feet.

pa = the actual controlled emission rate in lb/MMBtu using the emission factor from AP-42 or stack test data.

Particulate Matter Limitation 326 IAC 6-2-4

That pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from two boilers identified as 8 and 9 each having a heat capacity of 40.2 MMBTU per hour shall be limited to 0.1 pound per million BTU heat input. The boilers comply with this rule.

The PM was calculated by: $Pt = 1.09/Q^{0.26}$ (Refer to Appendix A for further details)

Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from boilers identified as 3 and 4 each having a heat capacity of 50.0 MMBTU per hour shall be limited to 0.5 pounds per million BTU heat input. Based on the calculations in the TSD, boilers will comply with the rule.

Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from boilers identified as 8 and 9 each having a heat capacity of 40.2.0 MMBTU per hour shall be limited to 0.5 pound per million BTU heat input. Based on the calculations in Appendix A boilers will comply with the rule.

Used Oil Requirements

The waste oil burned in boilers 3,4,8, and 9 shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

- (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),
- (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and
- (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

Boilers identified as 3, 4, 6, and 7

According to the TSD of the existing permit (CP 003-4377-0003) it was not necessary to calculate the equivalency of the back up fuels with respect to the primary fuel because the boilers predate PSD rules.

Boilers identified as 8 and 9

According to the TSD of the existing permit (CP 003-4377-00003) it was not necessary to calculate the equivalency of the back up fuels with respect to the primary fuel because the number 2 fuel oil (worst case) was used to determine that PSD does not apply. The company removed boiler number 5 and used the credits towards the boilers 8 and 9.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the surface coating booths 1, 2, and 3 shall be limited to 3.5 pounds of VOCs per gallon of coating less water.

The coatings used are considered extreme performance coatings which are coatings designed for exposure to temperatures consistently above ninety-five degrees Celsius (95° Celsius), detergents, abrasive or scouring agents, solvents, corrosive atmospheres, outdoor weather at all times, or similar environmental condition.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the surface coating booths 1,2, and 3 is in compliance with this requirement.

326 IAC 6-3-2 (Process Operations)

- a) The particulate matter (PM) overspray from the surface coating booths 1, 2, and 3 be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- b) The dry filters for particulate matter over spray control shall be in operation at all times when the surface coating booth is in operation to assure compliance with this rule.
- c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.
- d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

326 IAC 1-6-3 (Preventive Maintenance Plans)

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), Dana Corporation, Spicer Axle Division, shall prepare and maintain a preventive maintenance plan, including the following information:

- a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
- b) a description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
- c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

326 IAC 8-3 (Organic solvent degreasing: Operations)

This rule is not applicable to cleaning and washing processes because the process of degreasing is wiping and brushing.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) 326 IAC 2-1-3.4 (New source toxics control) rule is not applicable to this source since the facilities or process lines were constructed and reconstructed prior to the effective date (July 27, 1997) of this rule.

Conclusion

The operation of this axle manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T003-7741-00003**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit and Enhanced New Source Review (ENSR))

| | |
|------------------------------|---|
| Source Name: | Dana Corporation, Spicer Axle Division |
| Source Location: | 2100 West State Blvd., Fort Wayne, IN 46801 |
| County: | Allen |
| SIC Code: | 3714 |
| Operation Permit No.: | T003-7741-00003 |
| Permit Reviewer: | Peggy Zukas |

On November 6, 1997, the Office of Air Management (OAM) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Dana Corporation, Spicer Axle Division had applied for a Part 70 Operating Permit to operate an axle manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 8, 1998, Dana Corporation, Spicer Axle Division submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

New language is **bolded** and the ~~strikeout~~ language has been deleted.

Comment 1:

The Compliance Response Plan (CRP) requirements and provisions contained in Sections C.17, D.1.6(e) (Boilers 3 and 4), D.3.8(e) (Boilers 8 and 9), and D.4.6 (Surface Coating Sprays 1, 2, and 3) exceed the regulatory and statutory authority of the IDEM, OAM, in drafting Part 70 Operating Permits.

- No regulation requires the Dana Corporation to predict malfunctions or "conditions which should result in a response step".
- No regulation requires the Dana Corporation to identify corrective action timetable, trouble shooting contingency or response steps for these malfunctions or conditions.
- Moreover, no regulation requires that these operate "properly"

All that is required is that the Dana Corporation comply with the applicable emission limits and other stated applicable requirements.

- Furthermore, no regulation authorizes the OAM to enforce the failure to take a response step within the time prescribed in said CRP as a violation of the permit.

The draft Part 70 Operating Permit attempts to impose requirements on the Dana Corporation based on an IDEM guidance document which exceeds any regulatory requirements. See "Title V Air Permit Compliance Monitoring Guidance, " May 15, 1996. The imposition of this guidance document, which has not been adopted by notice and comment rule making, is illegal and invalid. The applicable regulations require that Title V permits include the following:

Monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

326 IAC 2-7-5(3)

The CRP and the requirements concerning failure to take response steps contained in the draft permit far exceed not only the permit requirements provided by regulation but also the purpose behind compliance monitoring which is "to evaluate continuous compliance with the applicable requirements." Failing to meet specified troubleshooting contingency and response steps should be a working tool for an operator to regain a fine tuned facility and not a dagger with which to threaten him when no applicable requirement has even been violated.

Response to Comment 1:

Please refer to response to comment 2.

Comment 2:

To the extent that the recently promulgated federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, applies to emission units with pollution control device equipment under the Part 70 permit program, the Dana Corporation requests that this rule be applied in place of the compliance monitoring requirements contained in the draft permit for its surface coating spray booths (sprays 1, 2, and 3), with associated fabric filters, to avoid conflicting, diverse, and/or duplicative compliance monitoring requirements. The development of compliance monitoring plans and the training of personnel toward implementation of such plans is not only time consuming and costly, but would also be detrimentally confusing and overly burdensome if the Dana corporation is required to prepare two separate compliance monitoring plans to satisfy the IDEM guidance document and then the Part 64 CAM rule.

Furthermore, the preamble to the final federal CAM rule states that it "is intended to address the requirement in the Title VII of the 1990 Amendments that EPA promulgate enhance monitoring and compliance certification requirements for major sources, and the related requirement in Title V that operating permits include monitoring, compliance certification, reporting and record keeping provisions to assure compliance." 62 FR 54902. No further regulation of these covered emission units for compliance monitoring is either authorized or intended. The preamble to the final rule for the Part 64 CAM rule clearly states that the U.S. EPA is finalizing this rule with an extended implementation schedule as the only applicable compliance monitoring regulation for the emission units covered by the rule to relieve the burden of developing and preparing monitoring plans for these emission units during the initial permitting process. The preamble states:

This extended implementation schedule will relieve much of the burden on source owners or operators to develop and prepare proposed monitoring during the initial part 70 permitting process and will similarly relieve the burdens of the approval process on permitting authorities.

62 FR 54903. The compliance monitoring requirements contained in the draft permit for the surface coating spray booths (sprays 1,2, and 3) should not be based upon any IDEM guidance or IDEM draft permit, but rather on the Part 64 CAM rule. The draft Part 70 Operating Permit should be revised to be consistent with the Part 64 CAM rule in its application to the three surface coating spray booths (sprays 1, 2, and 3) at the Dana Corporation Spicer Axle Division.

Response to Comment 2:

The U.S. EPA's CAM rule supplements the existing federal requirements of 40 CFR 70 and corresponding Indiana authority under 326 IAC 2-7. The CAM rule does not apply to this permit (nor does it apply to the majority of Indiana's initial Part 70 permits) because a completed application was received prior to this rule. The OAM is continuing to implement Indiana's established approach to compliance monitoring while considering how to address the federal CAM rule through the State rulemaking process. An overview of the established compliance monitoring approach follows.

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Comment 3:

Notwithstanding the above-discussed comments concerning the Compliance Monitoring Requirements, Section C.18(a) should be revised for clarity in the last sentence to read:

"IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests if the Permittee fails to take appropriate corrective actions."

Response to Comment 3:

The OAM had approved the added language in bold however, due to further review by OAM's legal council the added language will be deleted. According to Office of Legal Council , if OAM agrees with this added language it would prevent OAM from being able to enforce non-compliance with a limit as long as the source is taking appropriate steps to come into compliance. The OAM can not waiver the right to pursue an enforcement action for violation of an emission limit just because the source is trying to come back into compliance.

On page 24 of 43 Section C.18 (a) the condition will remain as follows:

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests. ~~if the Permittee fails to take appropriate corrective actions.~~

Comment 4:

The Section D Facility Operation Conditions for the draft Part 70 Operating Permit contain inappropriate and inconsistent statements concerning testing requirements and performance testing for facilities which expressly have no applicable testing requirement and these statements should be removed. Specifically, the statements contained in Sections D.1.4.(a) (Boilers 3 and 4), D.2.4 (Boilers 6 and 7), D.3.5 (Boilers 8 and 9), and D.4.4 (Surface Coating Sprays 1, 2, and 3) should be replaced with the following statement:

"Testing of this facility is not specifically required by this permit."

In the event that a testing requirement became applicable to these facilities during the course of the permit period, the applicability of any compliance determination or performance testing requirements should be addressed at the time and not prior to the particular testing requirements.

Response to Comment 4:

According to rule 326 IAC 2-7-6(2)(D), each Part 70 permit issued under this rule shall contain the following requirements with respect to compliance. Such as, inspection and entry require that, upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the commissioner, an authorized representative of the commissioner, or the U.S. EPA to perform the following:

- (D) As authorized by the CAA, sample or monitor substances or parameters for the purpose of assuring compliance with a Part 70 permit or applicable requirements.

Thus, OAM has the authority to inform the company that testing requirements and performance testing for facilities may be required to insure compliance with Part 70 permit. Therefore, there is no change on conditions D.1.4.(a), D.2.4, D.3.5 and D.4.4. Due to the deletion of the PMP condition the following section numbers have been changed to D.1.3(a), D.2.3, and D.3.4.

Comment 5:

The Preventive Maintenance Plan (PMP) provision contained in the General Conditions, Section B.12, incorrectly and inappropriately refers to the term “emission units” when describing the types of equipment for which a source must identify the individual(s) responsible for inspecting, maintaining, and repairing said equipment in its PMP. See B.12(a)(1). The applicable requirement for maintaining a PMP provides that the plan include “[i]dentification of individual(s) responsible for inspecting, maintaining, and repairing emission control devices” only. 326 IAC 1-6-3; see also, 326 IAC 2-7-5(13).

Response to comment 5:

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5 (13). Both of those rules refer back to the Preventive Maintenance Plan requirement found in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3 (a)(1),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3 (a) (2)).

Pursuant to 326 IAC 1-6-1 (Applicability), 326 IAC 1-6-3 applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-1-2 and 326 IAC 2-1-4. Therefore, it is clear from the structure of 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3 (a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. In additional support of this position, 326 IAC 1-6-5 provides that the commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment. Therefore, there is no change made on the condition.

Comment 6:

The draft Part 70 Operating Permit has inappropriately required a Preventive Maintenance Plan (PMP) for facilities at the Spicer Axle Division which are not controlled by emission control devices. The applicable regulation requiring PMPs for facilities refers solely to inspecting, maintaining, and repairing emission control devices and the identification of their replacement parts. 326 IAC 1-6-3. Facilities which are not controlled by emission control devices are not intended to be required to maintain a PMP. Because the boilers 3,4,6,7,8, and 9 are not controlled by emission control devices, these facilities should not be required to maintain PMPs and the draft permit should be revised to remove this requirement presented in Sections D.1.3, D.2.2, and D.3.4.

Response to comment 6:

Since the actual emissions are less than the 25 tons per year, the OAM will remove the Preventive Maintenance Plan (PMP) condition from the following D sections: D.1.3, D.2.2, and D.3.4. Please refer to response number 5 the last paragraph for an explanation why control devices are not the only requirement for a PMP. The following are the criteria that OAM uses to determine the applicability of PMP.

IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

- 1) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- 2) the unit has existing applicable requirements; and
- 3) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- 4) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- 5) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, compliance monitoring will never be necessary, it only states that a compliance monitoring plan is not required for a Title V operating permit application to be considered administratively complete. In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above. However, there are some types of operations that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary in the permit to ensure continuous compliance.

~~D.1.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]~~

~~A Preventive Maintenance Plan, in accordance with Section B -- Preventive Maintenance Plan, of this permit, is required for this facility.~~

Preceding conditions have been renumbered due to these deletions.

Comment 7:

Section A.2(8) of the Source Summary for the draft Part 70 Operating Permit and pages 2 and 3 of the TSD should be revised to correct the description of the cleaning process at the Spicer Axle Division. The cleaning process is not "used to clean paint booths" or "flow coaters" and therefore, this language should be deleted from the process description. Section A.2(8), Item (8) on page 2 of the TSD, and Item (a)(1) on page 3 of the TSD should be revised, as follows:

Cleaning process, using mineral spirits, to clean spray guns, and on an as needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year. (additional language has been clarified in italics)

Response to comment 7:

The cleaning description in section A.2(7), Item (8) on page 2 of the TSD is revised as follows:

- 8) Cleaning process, ~~solvent used~~ **using** mineral spirits, ~~used to clean paint booths~~, spray guns, ~~flow coaters~~ and on an as needed basis to clean parts for quality control inspection, stored in a close container, maximum usage is 6,000 gallons per year.

Comment 8:

The Section A Source Summary for the draft part 70 Operating Permit should be revised to specifically state each and every insignificant activity in Section A.3 which was included on Form GSD-10(a), Pages 5-11 of 11, in the permit application for the Spicer Axle Division. Of the many stated insignificant activities in the permit application, only the natural gas-fired combustion sources identified as boilers 6 and 7 have been included in the draft Part 70 Operating Permit under Section A.3. The TSD, pages 2-3 of 13, contains a listing of the insignificant activities which should be repeated in Section A.3 of the draft permit.

Response to comment 8:

While the Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions), the rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAM ordinarily includes insignificant activities only as necessary to identify specific applicable requirements. During the development of the model Title V Operating Permit and the subsequent implementation of the program, this approach has been the consensus recommendation of both the regulated community and the OAM. In many cases future additions or deletions of insignificant activities will not require a modification of this permit. It was felt that there would be less confusion if the permit did not give the impression that the rules required every insignificant activity to be listed in the permit. Therefore, there is no change made on the permit due to this comment.

Comment 9:

The TSD for the draft Part 70 Operating Permit includes discussion concerning the potential emissions (TSD, pages 6-7) and classification for the Spicer Axle Division source as a PSD major source (TSD, page 9) which should be corrected based upon the accounting of potential emissions in the attached revised permit application forms which identifies this source as a PSD minor source.

Response to comment 9:

Since the Title V potential emissions (provided by the Dana Corporation, Spicer Axle in their Title V application) are below the 250 tons per year, the sources status has changed from a **major source to a minor source under PSD**. Emissions were reduced because of the following:

- 1) Number 6 fuel oil was replaced by Number 2 fuel oil as an alternative fuel for boilers 3 and 4,
- 2) the shut-down and removal of coal fired boiler No. 5, and
- 3) the removal of a secondary fuel, waste oil, from boilers 3,4, 8, and 9.

Since the TSD can not be physically changed, this TSD addendum will document the change. OAM has made the following changes to the TSD and the permit:

1. On page 6 of 13 under "Potential Emissions" the paragraph was amended as follows:

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

| Pollutant | Potential Emissions (tons/year) |
|-----------------|---------------------------------------|
| PM | less than 100 |
| PM-10 | less than 100 |
| SO ₂ | less than 100 |
| VOC | greater than 100 less than 250 |
| CO | less than 100 |
| NO _x | greater than 100 less than 250 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Potential Emissions (tons/year) |
|---------------|---------------------------------|
| Glycol Ethers | 20.12 |
| TOTAL | 20.12 |

- (a) The potential emissions (as defined in the Indiana Rule) of ~~particulate matter~~, oxides of nitrogen, ~~sulfur dioxide~~, ~~carbon monoxide~~, and volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

2. On page 9 of 13 of the TSD the source description has been changed to be as follows:

~~Dana Corporation, Spicer Axle Division is not subject to PSD review because boilers 3, 4, 6 and 7 predate the rule and boilers 8 and 9 netted out of PSD review by the shut down and removal of boiler 5.~~

- (a) **The total potential emissions of all criteria pollutants are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Preventive of Significant Deterioration) and 40 CFR 52.21 will not apply.**
- (b) **Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.**

3. OAM has made the following changes to the permit on page 6 of 43:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an axle manufacturing plant.

Responsible Official: William Hoffman
Source Address: 2100 West State Boulevard, Fort Wayne, Indiana 46801
Mailing Address: P.O. Box 750 Fort Wayne, Indiana 46801
SIC Code: 3714
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Major source, under PSD
Major Source, Section 112 of the Clean Air Act

4. OAM has made the following changes to the permit on page 19 of 43 section C.1:

~~Dana Corporation, Spicer Axle Division is not subject to PSD review because boilers 3, 4, 6 and 7 predate the rule and boilers 8 and 9 netted out of PSD review by the shut down and removal of boiler 5.~~

- (a) **The total potential emissions of all criteria pollutants are less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Preventive of Significant Deterioration) and 40 CFR 52.21 will not apply.**
- (b) **Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.**

5. Since OAM has used the emission calculations provided by the applicant, the updated emissions for the year 1998 on page 7 of 13 of the TSD has been amended from:

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1995 emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 21.6 |
| PM-10 | 6.3 |
| SO ₂ | 49.2 |
| VOC | 29.2 |
| CO | 16.3 |
| Glycol Ethers | 6.76 |
| NO _x | 56.0 |

6. Since the particulate matter, particulate matter 10, sulfur dioxide, and carbon monoxide potential emissions are less than 100 tons per year the following paragraph on page 10 of 13 of the TSD was amended as follows:

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year (for specific counties) or one hundred (100) tons per year of nitrogen oxides, ~~sulfur dioxides, carbon monoxide, particulate matter 10, particulate matter~~ and volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

Comment 10:

Because the Spicer Axle Division no longer uses (and does not intend to use in the future) waste oil as a secondary fuel for its boilers, identified as boilers 3, 4, 8, and 9, all requirements, provisions, and references for the use of waste oil should be removed from the Part 70 Operating Permit. Accordingly, the following sections of the draft permit should be revised to omit the term "waste oil":

- 1) D.1, listing of applicable facilities
- 2) D.3, listing of applicable facilities
- 3) D.3.1 (b)
- 4) D.3.6
- 5) D.3.7 (b)
- 6) Technical Support Document (TSD), page 1 of 13, Items 1, 2, 4, and 5 of the permitted emission units listing.
- 7) TSD, page 4 of 13, identification of fuel used by Boilers 3,4,8, and 9
- 8) TSD, page 9 of 13, Federal Rule Applicability (C)

In addition, the following sections of the draft permit concerning waste oil should be removed due to inapplicability to the subject facilities:

- 1) D.1.1 (c)
- 2) D.1.9, in its entirety

- 3) D.3.11, in its entirety
- 4) TSD, page 11 of 13, State Rule Applicability, "Used Oil Requirements."

Response to Comment 10:

A) The following changes to the permit on page 6 of 43 section A.2 of the permit and page 1 of 13 of the TSD were amended as follows:

- 1) One (1) boiler, identified as boiler 3, segment ID 001, fueled by natural gas, using distillate fuel ~~and waste oil and liquid petroleum gas~~ as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 1B.
- (2) One (1) boiler, identified as boiler 4, segment ID 002, fueled by natural gas, using distillate fuel ~~and waste oil and liquid petroleum gas~~ as back-up fuel, boiler rated at 50.0 MMBtu per hour, exhausting at one (1) stack, identified as stack 2B.
- (3) Two (2) boilers, identified as boilers 6 and 7, fueled by natural gas, **using #2 fuel oil as back-up fuel**, each boiler rated at 6.7 MMBtu per hour, each exhausting to one (1) stack.
- (4) One (1) boiler, identified as boiler 8, segment ID 002, fueled by natural gas, using distillate fuel, liquid petroleum gas, ~~and waste oil~~ as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 6B.
- (5) One (1) boiler, identified as boiler 9, segment ID 002, fueled by natural gas, using distillate fuel liquid petroleum gas, ~~and waste oil~~ as back-up fuel, boiler rated at 40.2 MMBtu per hour, exhausting at one (1) stack, identified as stack 7B.

B) Due to a second back-up fuel (LPG) being utilized, Section D.1.1 has been revised as follows.

D.1.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 the particulate matter (PM) from the boilers identified as 3 and 4 shall be limited to:

- (a) 0.6 pounds per MMBtu when using natural gas.
- (b) 0.6 pound per million BTU heat input when using distillate fuel.
- ~~(c) 0.6 pound per million BTU heat input when using waste oil.~~
- (c) 0.6 pound per MMBtu heat input when using liquid petroleum gas.**

C) The following condition was removed from the permit since waste oil is no longer being used as a fuel. On page 30 of 43 section D.1.9 was amended as:

~~D.1.9 Used Oil Requirements [329 IAC 13-3-2]~~

~~The waste oil burned in the boilers 3 and 4 shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:~~

- ~~———— (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification);~~
- ~~———— (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and~~
- ~~———— (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking);~~
- ~~———— The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.~~

D) The following changes to the permit on page 31 of 43 section D.2.1 was amended as follows:

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 6.7 MMBtu per hour heat input boilers shall be limited to 0.8 pounds per MMBtu.

This limitation is based on the following equation: $Pt = (C) (a) (h) / (76.5) (Q^{0.75}) (N^{0.25})$
C = Maximum ground level concentration being 50 micrograms/cubic meter
Pt = Pounds of particulate matter emitted per MMBtu heat input (lb/MMBtu)
Q = Total source maximum operating capacity rating in MMBtu/hr heat input
N = Number of stacks in fuel burning operation
a = Plume rise factor being 0.67

E) The following changes to the permit on page 32 of 43 section D.3.1(b) was amended as follows:

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-3][40CFR 60.40c]

Pursuant to 326 IAC 6-2-3 the particulate matter (PM) from the boilers identified as 8 and 9 shall be limited to:

- (a) 0.1 pounds per MMBtu when using natural gas.
- (b) 0.1 pound per million BTU heat input. Based on a heating value of 140,000 Btu per gallon of oil, the fuel sulfur content of the oil used for fuel shall be limited to 0.5 percent (%) when using distillate fuel ~~or waste oil~~.
- (c) 0.1 pounds per MMBtu when using LPG propane fuel.

F) On page 33 of 43 Section D.3.6 of the permit and page 9 of 13 (c) of the TSD the condition shall be amended as follows:

D.3.6 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options when using distillate fuel ~~or waste oil~~:

G) On page 33 of 43 Section D.3.6(b) of the permit the condition shall be amended as follows :

D.3.7 Monitoring

- (a) There are no compliance monitoring for this boiler when burning natural gas or LGP propane.

\

- (b) Annual oil sampling shall be conducted as described in 326 IAC 3-3-4(a). Oil sample preparation and sulfur analyses shall be conducted using ASTM test methods as described in 326 IAC 3-3-4 (a) when using distillate fuel ~~and waste oil~~.

H) The following condition was removed from the permit since waste oil is no longer being used as a fuel. On page 34 of 43 section D.3.11 and page 11 of 13 the conditions have been deleted:

D.3.11 Used Oil Requirements

~~The waste oil burned in the boilers 8 and 9 shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:~~

- ~~—— (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification);~~
- ~~—— (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and~~
- ~~—— (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).~~

~~—— The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3-1 is prohibited at this source.~~

I) On page 4 of 13 under Emission Calculations of the TSD waste oil shall be removed as one of the fuels being used. The number 2 fuel oil has be added to boilers 6 and 7 and liquid petroleum gas has been added to boilers 3 and 4.

| Boiler ID | MMBtu/hr | Construct- ion date | Limit PM lb/MMBtu | Comply with rule 326 IAC 6-2 | Limit SO2 lb/MMBtu | Comply with rule 326 IAC 7-1 | Fuel used |
|-----------|----------|------------------------|----------------------|---------------------------------------|---|---------------------------------------|--|
| Boiler 3 | 50.0 | 1973 | 0.6 for all fuels | yes | 0.5 distillate oil | yes | Natural gas, waste oil , distillate oil, liquid petroleum gas |
| Boiler 4 | 50.0 | 1973 | 0.6 for all fuels | yes | 0.5 distillate oil | yes | Natural gas, waste oil , distillate oil, liquid petroleum gas |
| Boiler 6 | 6.7 | 1953 | 0.8 | yes | N/A because the Potential emissions are less than 25 tons/yr and 10 lbs/hr | N/A | Natural gas # 2 fuel oil |

| | | | | | | | |
|----------|------|------|-------------------|-----|----------------------|-----|---|
| Boiler 7 | 6.7 | 1953 | 0.8 | yes | N/A same as boiler 6 | N/A | Natural gas # 2 fuel oil |
| Boiler 8 | 40.2 | 1995 | 0.1 for all fuels | yes | 0.5 distillate oil | yes | Natural gas, waste oil , distillate oil, propane gas |
| Boiler 9 | 40.2 | 1995 | 0.1 for all fuels | yes | 0.5 distillate oil | yes | Natural gas, waste oil , distillate oil, propane gas |

- 11) On page 5 of 13 of the TSD, OAM has deleted the following because waste oil is no longer used at the source.

(c) ~~Waste Oil PM limit~~

5. Boilers 3 and 4 rule applicability: (50.0 MMBtu/hr each)

~~Allowable PM Potential PM~~
~~30 lbs/hr > 0.4 lbs/hr complies with 326 IAC 6-2-3~~

~~Allowable PM10 After control PM10~~
~~30 lbs/hr > 0.4 lbs/hr complies with 326 IAC 6-2-3~~

6. Boiler 8 and 9 rule applicability: (40.2 MMBtu/hr each)

~~Allowable PM > Potential PM complies with 326 IAC 6-2-4~~
~~4.0 lbs/hr > 0.3 lbs/hr~~

~~Allowable PM10 > Potential PM10~~
~~4.0 lbs/hr > 0.3 lbs/hr complies with 326 IAC 6-2-4~~

(d) Fuel Oil PM limit

Boilers 6 and 7 rule applicability: (6.7 MMBtu/hr)

Allowable PM Potential PM complies with 326 IAC 6-2-3
5.4 lb/hr 0.4 lb/hr

12. The following has been added to page 6 of 13 of the TSD since boilers 3 and 4 are combusting a second back-up fuel.

Allowable PM Potential PM complies with 326 IAC 6-2-3
30.0 lb/hr 0.32 lb/hr

Upon further analysis, OAM has made the following changes.

1. Condition B.11 (a) (Annual Compliance Certification) has been changed as follows:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) ~~The Permittee shall annually certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

2. Under C.3 (Opacity) the statement, "This condition is not federally enforceable.", has been deleted. The condition has been changed as follows:

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

~~This condition is not federally enforceable.~~

3. C.4 (Open Burning) has been changed as follows:

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.**

4. Under C.5 (Incineration), the statement: "This condition is not federally enforceable.", has been removed.

5. C.6 (Fugitive Dust Emissions) has been changed as follows:

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~ **326 IAC 6-4-2(4) is not federally enforceable.**

6. C.22 (General Reporting Requirements) part (a) and (b) has been changed as follows:

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) **To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**
- (b) **The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

8. D.1.7 (has been changed to D.1.6) Record Keeping Requirements has been revised as follows:

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.

~~The fuel supplier certification shall contain, as a minimum, the following:~~

- (5) The name of the fuel supplier; and
(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the boiler stack exhaust.
(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further analysis, OAM has made a second revision to the permit:

- 1) A (Source Summary) has been changed as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

- 2) A.5 (Prior Permit Conditions Superseded) delete this condition. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

Section B

- 3) B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**
- 4) B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential, the Permittee must shall~~ furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee ~~must shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.
- 5) B.11 (Annual Compliance Certification) part (c) of the condition has been changed to the following.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

~~The notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 6) B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within **ninety (90) days** after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

7) B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- 1) B.14 Permit Shield the first sentence in part b of the condition has been replaced with a sentence from EPA.

~~(a) (b) The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.~~ **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit; **or**
- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

- ~~(b)~~ **(c)** ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~
- ~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]
- 8) B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9) B.18 (Permit Renewal) part (a) of the condition has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (a)** The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

10) B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification) shown below. Delete B.20 and B.21 and renumber the remainder of Section B. The new B.19 condition will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**

- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

- 11) B.24 (Inspection and Entry) remove “IDEM”, since Local Agencies do not have IDEM identification cards.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

- 12) B.25 (Transfer of Ownership or Operation) part (b) of the condition has been changed as follows:

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- 13) B.26 (Annual Fee Payment) has been changed as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

~~Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.~~ **Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.**

Section C

- 1) C.1 has been changed as follows:

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential ~~emissions to emit~~ of criteria pollutant are less than 250 tons per ~~365 consecutive day period year~~. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential ~~emissions to emit~~ to 250 tons per ~~twelve (12) consecutive month period year~~, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2 **and 40 CFR 52.21**, before such change may occur.

- 2) C.2 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour):

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

- 3) C.7 (Operation of Equipment) has been changed as follows:

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

- 4) C.8 (Asbestos Abatement Projects- Accreditation) and C.16 (Asbestos Abatement Projects) have been combined into one condition which will read as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**

(b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**

(1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**

(2) **If there is a change in the following:**

(A) **Asbestos removal or demolition start date;**

(B) **Removal or demolition contractor; or**

(C) **Waste disposal site.**

(c) **The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**

(d) **The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

All required notifications shall be submitted to:

**Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

- 5) C.9 (Performance Testing) change the rule cite to 326 IAC 3-6 and add the following language:

C.9 Performance Testing ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 6) C.10 (Compliance Schedule) has been changed as follows:

C.10 Compliance Schedule ~~[326 IAC 2-7-6(3)]~~
The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

7) C.11 (Compliance Monitoring) has been changed as follows:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than **ninety (90) days** after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days~~ after receipt of this permit, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8) C.13 (Monitoring Methods) has been changed as follows:

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

9) C.16 (Asbestos Abatement Projects) delete this condition. It is now C.8 (Asbestos Abatement Projects) and has been revised there.

~~C.16 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

- ~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

- ~~_____ (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~
- ~~_____ (1) When the amount of affected asbestos-containing material increases or decreases by at least twenty percent (20%); or~~
- ~~_____ (2) If there is a change in the following:~~
- ~~_____ (A) Asbestos removal or demolition start date;~~
- ~~_____ (B) Removal or demolition contractor; or~~
- ~~_____ (3) Waste disposal site.~~
- ~~_____ (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~
- ~~_____ (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~
- ~~_____ All required notifications shall be submitted to:~~
- ~~_____ Indiana Department of Environmental Management~~
- ~~_____ Asbestos Section, Office of Air Management~~
- ~~_____ 100 North Senate Avenue, P.O. Box 6015~~
- ~~_____ Indianapolis, Indiana 46206-6015~~
- ~~_____ (e) Procedures for Asbestos Emission Control~~
- ~~_____ The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(e). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- ~~_____ (f) Indiana Accredited Asbestos Inspector~~
- ~~_____ The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

10) C.15 (Emergency Reduction Plans) has been changed as follows:

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

11) C.16 (Risk Management Plan) has been changed as follows:

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

12) C.17 (Compliance Monitoring Plan - Failure to Take Response Steps) add the following rule cites:

C.17 Compliance Monitoring Plan - Failure to Take Response Steps ~~[326 IAC 2-7-5(3)]~~**[326 IAC 2-7-6]** **[326 IAC 1-6]**

13) C.18 (Actions Related to Noncompliance Demonstrated by a Stack Test), the following rule cites to the title, and language have been added as follows:

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

14) C.19 (Emission Statement) part (a) of the condition has been changed as follows:

C.19 Emission Statement ~~[326 IAC 2-7-5(3)(C)(iii)]~~**[326 IAC 2-7-5(7)]**~~[326 IAC 2-7-19(c)]~~**[326 IAC 2-6]**

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

15) C.21 (General Record Keeping Requirements) has been changed as follows:

C.21 General Record Keeping Requirements ~~[326 IAC 2-7-5(3)(B)]~~**[326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- 16) C.22 (General Reporting Requirements) change "Quality" to "Quarterly", and change the language as follows:

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quality~~ **Quarterly Compliance Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~_____ (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~_____ (2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~_____ (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~_____ (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~_____ A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Section D

- 1) D (Facility Operation Conditions) add the following language to the facility description box in all D sections. The two paint booths description is an example.

SECTION D. FACILITY OPERATION CONDITIONS

| |
|---|
| Facility Description [326 IAC 2-7-5(15)] |
|---|

- 2) D.1.3, 2.2, D.3.4, and D.4.4 (Testing Requirements) has been changed as follows.

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the (pollutant) limit specified in Condition D.x.x shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

- 3) D.4.5 (Volatile Organic Compounds) change the following rule cites. The purpose of this change is to make the condition less specific.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- 4) D.4.6 (Monitoring) has been changed as follows.

D.4.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray **from the surface coating booth stack S2** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

5) D.1.5, (a), D.3.7(a) (Visible Emission Notations) has been changed as follows.

D.1.5 (D.3.7) Visible Emissions Notations

- (a) Daily visible emission notations of the boilers (identified as 3, 4, 8 and 9) stack exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

6) D.1.3 (Sulfur Dioxide Emissions and Sulfur Content) in subpart (a) change 326 IAC 3-3-4 to 326 IAC 3-7-4, and in subpart (b) change 326 IAC 3-2.1 to 326 IAC 3-6.

D.1.3 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC ~~3-3-4~~ **3-7-4**, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the thirteen (13) MMBtu per hour heater, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC ~~3-2-1~~ **3-6**.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency/Deviation started: |
| Date/Time Emergency/Deviation was corrected: |
| Was the facility being properly operated at the time of the emergency/deviation? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency/deviation: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, IN 46801
Mailing Address: P.O. Box 750, Fort Wayne, IN 46801
Part 70 Permit No.: T003-7741-00003

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ in the box marked **"No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

| <u>Compliance Monitoring Requirement</u> (e.g. Permit Condition D.1.3) | Number of Deviations | Date of each Deviations | No Deviations |
|--|---------------------------------|------------------------------------|-------------------------------------|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

On April 4, 1999, OAM issued a construction permit, CP 003-10367-00003, to Dana Corporation. The OAM has incorporated the following permitted equipment and two (2) quarterly reporting forms into the Title V permit.

SECTION D.5

FACILITY CONDITIONS

- (10) One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.**

Emissions Limitation and Standards

D.5.1 Prevention of Significant Deterioration (PSD)[326 IAC 2-2)

- (a) The fuel oil no. 2 usages from the proposed Peak Shaving Generator, and the existing boilers 3, 4, 8, and 9 shall be limited as follows:

| Facility ID | Fuel Oil # 2 Usage Limit (kgal/yr) |
|---|------------------------------------|
| Boilers 3 & 4 (@ 50 mmBtu/hr) | 6,257 |
| Boilers 8 & 9 (@ 40.2 mmBtu/hr) | 5,030 |
| Proposed Peak Shaving Generator (6.7 mmBtu/hr) | 229.5 |
| TOTAL | 11,516.5 |

The fuel oil no. 2 usage limit shall be based on a twelve- month rolling period.

During the first twelve months of operation of the peak shaving generator, shall be limited such that the total usage (229.5 kgal/yr) divided by the accumulated months of operation (12 months) shall not exceed 19.125 kgal rolled on a monthly basis.

- (b) For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
- (c) For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

Compliance with this condition D.5.1 (a) through (c) will make the source wide emissions below 250 tons per twelve-month, thus keeping the source a minor source for the Prevention of Significant Deterioration (PSD).

D.5.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity from the Peak Shaving Generator stack exhaust #149 shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

D.5.3 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Peak Shaving Generator.

Compliance Determination Requirements

D.5.4 Testing Requirements

Pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) a one time compliance stack tests shall be performed for the Peak Shaving Generator within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Compliance stack tests shall be performed, to validate the Alternative Emission Factors (AEF) for NO_x used in the calculation. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Peak Shaving Generator stack exhaust #149 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Record Keeping and Reporting Requirements

D.5.6 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, D.5.2 the Permittee shall maintain records in accordance below.

- (1) Fuel oil usage and equivalent Nitrogen oxide (NOx) emissions;

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.5.2 the Permittee shall maintain records of daily visible emission notations of the Peak Shaving Generator stack exhaust #149.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

| Month | Column 1 | | | Column 2 | | | Column 1 + 2 | | |
|---------|--|---|---|--|---|---|--|---|---|
| | Peak shaving Fuel Oil No. 2 Usage This month | Boilers 3 & 4 Fuel Oil No. 2 Usage This Month | Boilers 8 & 9 Fuel Oil No. 2 Usage This Month | Peak shaving Fuel Oil No. 2 Usage for Past 11 Months | Boilers 3 & 4 Fuel Oil No. 2 Usage for Past 11 Months | Boilers 8 & 9 Fuel Oil No. 2 Usage for Past 11 Months | Peak shaving Fuel Oil No. 2 Usage 12 Month Total | Boilers 3 & 4 Fuel Oil No. 2 Usage 12 Month Total | Boilers 8 & 9 Fuel Oil No. 2 Usage 12 Month Total |
| Month 1 | | | | | | | | | |
| Month 2 | | | | | | | | | |
| Month 3 | | | | | | | | | |

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Dana Corporation, Spicer Axle Division
Source Address: 2100 West State Blvd., Fort Wayne, Indiana 46801
Mailing Address: P.O Box 750, Fort Wayne, Indiana 46801
CP No.: 003-10367-00003
Facility: Peak Shaving Generator, Stack #149, Boilers 3, 4, 8, and 9
Limit: Peak Shaving Generator - 229.5 kgal per twelve-month period, rolled on a monthly basis.
Boilers 3 & 4 - 6,257 kgal per twelve-month period, rolled on a monthly basis.
Boilers 8 & 9 - 5,030 kgal per twelve-month period, rolled on a monthly basis.
For every million cubic feet of natural gas combusted is equivalent to 4,160 gallons of fuel oil no. 2.
For every thousand gallons of LPG combusted is equivalent to 790 gallons of fuel oil no.2.

YEAR: _____

| Month | Fuel Oil No. 2 Usage (Kgal/mo) | Natural Gas Usage (MMCF/mo) | LPG Usage (Kgal/mo) | Fuel Oil No. 2 Equivalent (MMCF/mo) | Total Fuel Oil No. 2 Usage (Kgal/mo) |
|-----------|--------------------------------------|-----------------------------------|------------------------|--|---|
| January | | | | | |
| February | | | | | |
| March | | | | | |
| April | | | | | |
| May | | | | | |
| June | | | | | |
| July | | | | | |
| August | | | | | |
| September | | | | | |
| October | | | | | |
| November | | | | | |
| December | | | | | |

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

The following should be added to the TSD:

Permitted Emission Units and Pollution Control Equipment

One (1) Peak Shaving Generator fired by diesel oil no. 2, with an output of 2,281 Kilo-Volt-Ampere (KVA), which is vented to stack #149.

Federal Rule Applicability

- (a) **New Source Performance Standards (326 IAC 12) and 40 CFR Part 63 applicable to this facility.**

- (1) **40 CFR Part 60.330- Standards of Performance for Stationary Gas Turbines. This NSPS applies to all stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 mmBtu/hr), based on the lower heating value of the fuel fired, which commences construction, modification, or reconstruction after October 3, 1977.**

This NSPS does not apply to generators. Therefore, the 2,281 KVA output Peak Shaving Generator in this application is not subject to this NSPS.

Note: Turbine is an engine that converts kinetic energy of a moving fluid into a mechanical power.

A generator converts the mechanical energy, which is extracted by the turbine into electrical energy.

- (b) **There are National Emission Standards for Hazardous Air Pollutant (NESHAP), 40 CFR Part 63, that would apply to this 2,281 KVA output Peak Shaving Generator.**

State Rule Applicability

- (a) **326 IAC 2-6 (Emission Reporting)**

This facility is subject to 326 IAC 2-6 (Emission Reporting), it emits greater than 100 tons/yr of NO_x. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

- (b) **326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)**

The 2,281 KVA output Peak Shaving Generator is not subject to this rule because it is not a source of indirect heating.

- (c) **326 IAC 7-1 (Sulfur Dioxide Emission Limitation)**

The 2,281 KVA output Peak Shaving Generator is not subject to this rule, because its SO₂ emissions are less than 25 tons per year or 10 pounds per hour.

- (d) **326 IAC 8 (Volatile Organic Sources)**

No provisions under Article 326 IAC 8 applies to the 2,281 KVA output Peak Shaving Generator, because it does not fit to any of the source criteria in the rules.

(e) 326 IAC 10 (Nitrogen Oxides (NOx) Rules)

This rule only applies to sources located in Clark and Floyd Counties. This does not apply to the source, because it is located in Allen County.

(f) 326 IAC 2-1-3.4 (New Air Toxics Control Rule)

This rule does not apply to the 2,281 KVA output Peak Shaving Generator, because it does not emit any HAP.